

1. Ameridose filed its Motion on April 11, 2014, in which it asks the Court to authorize the destruction of various products which were returned to Ameridose in response to its voluntary recall of all products from the market (“Recalled Inventory”).

2. UniFirst and the Tennessee Clinic Defendants requested certain information and documents from Ameridose to assist them in determining whether, and to what extent, the Recalled Inventory is relevant to their defense (or whether examination of that inventory may lead to the discovery of other relevant and admissible evidence).

3. Counsel for Ameridose provided UniFirst and the Tennessee Clinic Defendants with a subset of the information requested, namely spreadsheets that list all of the Recalled Inventory.

4. To allow UniFirst and the Tennessee Clinic Defendants the opportunity to review the Ameridose information and to meet and confer with Ameridose to determine whether Ameridose would provide additional information, the parties agreed to extend the time to respond to Ameridose's Motion to May 9, 2014 (Dkt. Nos. 1098, 1099).

5. After further discussions regarding the Recalled Inventory, UniFirst, the Tennessee Clinic Defendants, and Ameridose reached an agreement with regard to the destruction of Ameridose's inventory of recalled "controlled substances."

6. The parties also agreed to extend the time to respond to Ameridose's Motion to May 23, 2014, to further narrow any disagreement on how to handle the remaining materials in the Recalled Inventory.

7. On May 22, 2014, the Court entered an order authorizing the destruction of these "controlled substances." (Dkt. No. 1138).

8. UniFirst, the Tennessee Clinic Defendants, and Ameridose are continuing to meet and confer regarding how to handle the remainder of Ameridose's recalled product, but there are a number of factors that make this a complicated issue, and the parties believe that the additional time requested is reasonably necessary to enable them to sift through these factors and to narrow

(if not eliminate) remaining areas of disagreement on this issue. None of the parties believe that this extension will result in any undue delay in this case.

9. UniFirst and the Tennessee Clinic Defendants therefore request an extension, until July 18, 2014, to submit any response to Ameridose's Motion.

10. Ameridose assents to the relief requested herein.

WHEREFORE, UniFirst and the Tennessee Clinic Defendants respectfully request, with the assent of Ameridose, that the Court grant its motion and enter an Order extending UniFirst and the Tennessee Clinic Defendants' time to respond to Ameridose's Motion to July 18, 2014.

Respectfully submitted,

DEFENDANT UNIFIRST CORPORATION

By its attorneys,

/s/ James C. Rehnquist

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**AND**

THE TENNESSEE CLINIC DEFENDANTS

By their attorneys,

*/s/ Chris J. Tardio* \_\_\_\_\_

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<sup>1</sup> Admitted pursuant to MDL Order No. 1.

<sup>2</sup> Admitted *pro hac vice*.

**LOCAL RULE 7.1(A)(2) CERTIFICATION**  
**AND CERTIFICATE OF SERVICE**

I, James C. Rehnquist, hereby certify that counsel for Defendant, UniFirst Corporation, conferred by e-mail with opposing counsel in an effort to resolve or narrow the issues presented in this motion prior to filing, and opposing counsel assents to the relief sought herein.

I further certify that a copy of this document, filed through the CM/ECF system will be accessible to those attorneys who are registered with the Court's electronic filing system and Notice of Electronic filing (NEF) will be sent to these parties by operation of the CM/ECF system on May 22, 2014.

/s/ James C. Rehnquist